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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

AMBASSADOR MARC GINSBERG and
COALITION FOR A SAFER WEB,

Plaintiffs,

v.

GOOGLE LLC.,

Defendant.

CASE NO.: 5:21-cv-00570-BLF

PLAINTIFFS' STATUS REPORT

Judge Beth Labson Freeman

Plaintiffs Ambassador Marc Ginsberg and Coalition for a Safer Web, pursuant to the October 22, 2021, Order of this Honorable Court (*See* Dkt. 31), by and through their counsel Keith Altman, submit to this Status Report and state as follows:

1. The undersigned attorney continues to suffer from serious health problems that substantially impact his vision and ability to comply with litigation deadlines in the present case. This condition has worsened since the last update to the point that reading is now a challenge. Accommodations are underway.

1 2. As a result of these serious health problems, the undersigned attorney has been
2 unable to make significant progress towards Plaintiffs' litigation goals.

3 However, Plaintiffs intend to file their Opposition to Defendant's Motion to
4 Dismiss Plaintiffs' First Amended Complaint before November 5, 2021.

5 3. It remains Plaintiffs' hope that this Court will grant a continuance to the current
6 postponement of all conferences, hearings, and trial dates, as well as extend
7 deadlines for discovery and all other pre-trial deadlines until after *Taamneh v.*
8 *Twitter, et al.*, No. 18-17192, *Gonzalez v. Twitter, et al.*, No. 18-16700, and
9 *Clayborn v. Twitter, et al.*, No. 19-15043 have been decided.
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12 Dated: October 29, 2021

Respectfully submitted,

14 /s/ Keith Altman

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22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on October 29, 2021, I served the foregoing document on all Defendants of
24 record via electronic filing:

25 By: /s/ Keith Altman
Keith Altman
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